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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TANIA V. REAL DE RAGAN,)	Case No: 2:16-cv-02468-JAD-PAL
)	
Plaintiff)	
)	
v.)	JOINT STIPULATION FOR EXTENSION
)	OF TIME TO FILE DEFENDANT'S
)	CROSS-MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security, ¹)	(First Request)
)	
Defendant.)	
)	

¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this case by reason of the last sentence of section 205(g) of the Social Security Act. 42 U.S.C. § 405(g).

1 Plaintiff Tania V. Real De Ragan (Plaintiff) and Defendant Nancy A. Berryhill, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty-one
4 days from May 5, 2017 to June 5, 2017, with all other dates in this Court's Scheduling Order
5 extended accordingly. This is the Commissioner's first request for an extension.

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18 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or Remand
19 (Plaintiff's Motion), counsel has been handling a large number of District Court cases in addition
20 to this one, with two briefs due this week, three briefs due next week, and a settlement conference
21 next week, as well. Additionally, the Commissioner's counsel will be out of the office on approved
22 leave for four days next week. Further, counsel has had numerous other deadlines in the past
23 month, including other District Court briefs, a settlement memorandum, and ongoing discovery in
24 an employment case which was completed this week. As a result, the Commissioner needs
25 additional time to properly respond to the issues Plaintiff raised in her Motion. Plaintiff has no
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1 objection.

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Respectfully submitted,

3 Date: May 5, 2017

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By: /s/* Marc V. Kalagian
MARC V. KALAGIAN
Attorney at Law
*by email authorization on 5/4/17

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Attorney for Plaintiff

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Date: May 5, 2017

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STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Chief, Civil Division

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By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

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Attorneys for Defendant

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IT IS SO ORDERED.


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20 DATE: May 5, 2017

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THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge

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